

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Robert Khan : Chapter 13
Debtor :
: Bankruptcy No. 19-11360-pmm
:

Supplemental Application For Compensation And Reimbursement of Expenses For Services Performed After Confirmation of Chapter 13 Plan

Brenna H. Mendelsohn, Esquire and Mendelsohn & Mendelsohn, P.C. (hereinafter “applicants”), counsel to Robert Khan, applies under §330 of the Bankruptcy Code for an award of compensation and reimbursement of actual, necessary expenses and represents:

1. Applicant, Brenna H. Mendelsohn, Esquire, is counsel for the debtor.
2. The debtor filed a petition under chapter 13 of the Bankruptcy Code on March 5, 2019.
3. The Debtor’s Chapter 13 Plan was confirmed by this Honorable Court on January 16, 2020.
4. The Debtor’s annualized current monthly income as set forth on Form B22C is:
 above median (the amount on line 15 is not less than the amount on line 16)
 below median (the amount on line 15 is less than the amount on line 16)
5. The Debtor paid Applicant \$1,000.00 for fees and \$310.00 for the filing fee prior to the filing of the Chapter 13 Petition.
6. Applicant’s prior application:
First Application Period
3/5/19-1/16/20 Date of Order 2/13/20

Fees Requested \$4,250.00 Paid \$3,065.62

Expenses Requested 0.00

7. Applicant requests and has agreed to accept an award of supplemental compensation of \$1,200.00 for 4.8 hours expended in providing the following services: preparation, review and filing with the Court all of the required documents for review paperwork, conversations and miscellaneous contact with the client, the Trustee and other parties in interest regarding the Motion to Modify Plan.
8. Applicant requests that compensation be awarded at the following hours rate:

Brenna H. Mendelsohn, Esquire	\$250.00 per hour
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9. A copy of the Applicant's Amended Disclosure of Compensation pursuant to F.R.B.P. 2016b is attached as Exhibit "A".
10. Attached as Exhibit "B" is a copy of the applicant's time records setting forth the dates and amount of time expended for the services performed on behalf of the Debtor after confirmation of the Debtor's Chapter 13 Plan. Applicant has agreed to accept \$1,200.00 for the services rendered.
11. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the debtors, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable, and
 - a. Are not duplicative of services and expenses for which compensation or reimbursement was previously requested.
12. If this supplemental application is granted, the Debtor's Second Amended Chapter 13 Plan Post-Confirmation

is adequately funded
 is not adequately funded

13. None of the compensation paid to applicant will be shared with any person other than a member or regular associate of the applicant's law firm unless 11 USC Section 504(c) applies.

WHEREFORE, applicant requests and has agreed to accept an award of \$1,200.00 in compensation.

Respectfully submitted,

DATED: July 13, 2020

/s/ Brenna H. Mendelsohn, Esquire
Brenna H. Mendelsohn, Esquire
Mendelsohn & Mendelsohn, P.C.
637 Walnut Street
Reading, PA 19601
Phone: 610-374-8088
Fax: 610-478-1260

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Robert Khan : Chapter 13
Debtor :
: Bankruptcy No. 19-11360-pmm
:

**NOTICE OF SUPPLEMENTAL APPLICATION FOR APPROVAL OF COUNSEL
FEES PURSUANT TO SECTION 330 OF THE BANKRUPTCY CODE**

To the debtor, the Chapter 13 Trustee, the United States Trustee, and all parties of interest, NOTICE IS HEREBY GIVEN:

1. That Brenna H. Mendelsohn, Esquire and Mendelsohn & Mendelsohn, P.C., counsel for the debtor in the above-captioned matter has filed an Supplemental Application with this Court for Allowance of Compensation (“Applicants”) in connection with legal services rendered to the Debtor in these Bankruptcy proceedings.
2. That the Application requests the Court to enter an Order approving counsel fees in the amount of \$1,200.00 for work performed after confirmation of the plan as legal fees from the time period of 6/4/20-7/13/20.
3. That any answer, objection, responsive pleading or request for hearing in writing must be filed with the Clerk of the United States Bankruptcy Court, 400 Washington Street, Reading, PA 19601 and a copy thereof served on counsel whose name and address appear below, within twenty-one (21) days from the date of this notice.
4. That in the absence of an answer, objection or request for hearing, counsel will certify the same to the Court after twenty-one (21) days from the date of this notice and the court may enter the proposed Order approving said counsel fees.

Respectfully submitted,

Dated: July 13, 2020

MENDELSON & MENDELSON, P.C.

By: /s/ Brenna H. Mendelsohn
Brenna H. Mendelsohn, Esquire
637 Walnut Street
Reading, PA 19601

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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CERTIFICATE OF SERVICE

I, Brenna H. Mendelsohn, hereby certify that I served a copy of the Application of Brenna H. Mendelsohn, Esquire and Mendelsohn & Mendelsohn, P.C. for Allowance of Compensation Pursuant to Section 330 of the United States Bankruptcy Code and Notice of Filing of said application upon the debtor and the following individuals at the addresses listed below by first class mail and/or by electronic means, including any creditors that filed for notice on Pacer, on July 13, 2020.

SCOTT F. WATERMAN (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

United States Trustee
833 Chestnut Street
Philadelphia, PA 19107

I further certify that I served a copy of the Notice only upon the individuals and/or entities listed on the Matrix and any creditors that filed for notice on Pacer, by first class mail and/or by electronic means, on July 13, 2020.

Respectfully Submitted,

Dated: July 13, 2020 By: /s/ Brenna H. Mendelsohn
Brenna H. Mendelsohn, Esquire
Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Robert Khan : Chapter 13
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ORDER

AND NOW, upon consideration of the Application for Compensation (“the Application”) filed by the Debtor(s)’ counsel (“the Applicant”) and upon the Applicant’s certification that proper service has been made on all interested parties and upon the Applicant’s certification of no response,

It is hereby **ORDERED** that:

1. The Application is **GRANTED**.
2. Compensation is **ALLOWED** in favor of the Applicant in the amount of **\$1,200.00**.
3. The Chapter 13 Trustee chapter 13 is authorized to distribute to the Applicant as an administrative expense pursuant to 11 U.S.C. §1326(b), 11 U.S.C. §507, 11 U.S.C. §503(b) and 11 U.S.C. §330(a)(4)(B), the allowed compensation set forth in ¶2 which was paid by the Debtor(s) prepetition, to the extent such distribution is authorized under the terms of the confirmed chapter 13 plan.
- 4.

BY THE COURT

Patricia M. Mayer
U.S. Bankruptcy Judge

Bill for Services Rendered
Re: Robert Khan
Chapter 13 Bankruptcy
Case 19-11360-pmm
Agreed Rate: 250.00 p/hr

6/4/20-7/13/20 – 16 e-mails with Debtor re: notifying debtor he was delinquent 8 months, then discussing catching up, then discussing effects of Covid, tier of plan, new plan payment, when payments would be made, etc. 1.0 250

7/11/20 – Review Claims Register, Prior Plan, Trustee records re: payments to date	.5	125
7/11/20 – Preparation and filing of Modified Plan	1.0	250
7/13/20 – Preparation and filing of Motion to Modify Plan	1.0	250
7/13/20 – Letter to Debtor re: plan payment amount	.4	100
7/13/20 – Preparation and filing of amended disclosure of compensation	.2	50
7/13/20 – Preparation and filing of Application of Compensation	1.0	250
7/13/20 – Preparation and filing of proof of claim	.3	75

TOTAL: \$1,350.00
Discounted: \$150.00
Total Due: \$1,200.00

Exhibit "B"

United States Bankruptcy Court
Eastern District of Pennsylvania

In re Robert Khan

Debtor(s)

Case No. 19-11360
Chapter 13

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S) - AMENDED

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept	\$ <u>5,450.00</u>
Prior to the filing of this statement I have received	\$ <u>3,065.62</u>
Balance Due	\$ <u>2,384.38</u>

2. The source of the compensation paid to me was:

Debtor Other (specify):

3. The source of compensation to be paid to me is:

Debtor Other (specify): **Through the Chapter 13 Plan if approved by the Honorable Court.**

4. I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.

5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
- b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
- c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
- d. [Other provisions as needed]

Negotiations with secured creditors to reduce to market value; exemption planning; preparation and filing of reaffirmation agreements and applications as needed; preparation and filing of motions pursuant to 11 USC 522(f)(2)(A) for avoidance of liens on household goods.

6. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

Representation of the debtors in any dischargeability actions, judicial lien avoidances, relief from stay actions or any other adversary proceeding.

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

July 13, 2020

Date

/s/ Brenna H. Mendelsohn

Brenna H. Mendelsohn

Signature of Attorney

Mendelsohn and Mendelsohn, P.C.

637 Walnut Street

Reading, PA 19601

610-374-8088 Fax: 610-478-1260

tobykmendelsohn@comcast.net

Name of law firm